

Texas [Cause No. 2024-32483]. Plaintiff served the Original Petition on EKRE on or around June 5, 2024. Accordingly, EKRE's Notice of Removal is timely. *See* 28 U.S.C. § 1446.

3. Venue lies in this Court because this case was pending in the District Court of Harris County, Texas, and this Court is the "district court of the United State for the district and division embracing the place where the action is pending." *See* 28 U.S.C. § 1441(a).

4. EKRE will promptly serve notice and a copy of this Notice of Removal with the Clerk of Harris County, Texas, as required by 28 U.S.C. § 1446(d).

5. Attached to this Notice of Removal are the documents required by Local Rule 81. An index of that material follows:

<u>Exhibit</u>	<u>Document Description</u>
A	List of Counsel of Record
B	State Court Civil Docket Sheet
C	Original Petition filed on May 22, 2024
D	Request for Issuance of Service filed on May 22, 2024
E	Executed Citation filed on 6/06/2024
F	Domestic Return Receipt filed on 6/18/2024

CONCLUSION AND PRAYER

EKRE OF TX, LLC, provides notice that this civil action has been properly and immediately removed, pursuant to 28 U.S.C. §§ 1331, 1441, and 1446. EKRE OF TX, LLC, respectfully requests this Court exercise and maintain its jurisdiction over this case.

Respectfully submitted,

GRAY REED

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ATTORNEYS FOR EKRE of TX, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was forwarded to Plaintiff pursuant to the Federal Rules of Civil Procedure on this 28th day of June, 2024.

/s/ Kelly H. Leonard

Kelly H. Leonard